

1 COOLEY LLP
BOBBY GHAJAR (198719)
2 (bghajar@cooley.com)
COLETTE GHAZARIAN (322235)
3 (cghazarian@cooley.com)
1333 2nd Street, Suite 400
4 Santa Monica, California 90401
Telephone: (310) 883-6400
5 MARK WEINSTEIN (193043)
(mweinstein@cooley.com)
6 KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)
7 JUDD LAUTER (290945)
(jlauter@cooley.com)
8 ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
9 3175 Hanover Street
Palo Alto, CA 94304-1130
10 Telephone: (650) 843-5000

11 CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (212047)
12 (adunning@cgsh.com)
1841 Page Mill Road, Suite 250
13 Palo Alto, CA 94304
14 Telephone: (650) 815-4131

15 *[Full Listing on Signature Page]*
16 *Counsel for Defendant Meta Platforms, Inc.*

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 RICHARD KADREY, *et al.*,
21 Individual and Representative Plaintiffs,
22 v.
23 META PLATFORMS, INC., a Delaware
corporation;
24 Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF COLETTE GHAZARIAN IN
SUPPORT OF STIPULATION AND [PROPOSED]
ORDER RE SCHEDULING OF DEPOSITION**

1 I, Colette Ghazarian, hereby declare:

2 1. I am an Associate with the law firm Cooley LLP, counsel for Defendant Meta
3 Platforms, Inc. (“Meta”) in this matter. I submit this declaration in support of the Parties’
4 Stipulation re Deposition of Mark Zuckerberg. I declare that the following is true to the best of my
5 knowledge, information and belief, and that if called upon to testify, I could and would testify to
6 the following:

7 2. Following an Order from Magistrate Judge Hixson denying Defendant’s motion for
8 protective order regarding the deposition of its CEO Mr. Zuckerberg (ECF No. 171), the Parties
9 extensively met and conferred to find an acceptable date for Mr. Zuckerberg’s deposition. To avoid
10 further motion practice regarding that deposition – they ultimately reached an agreement regarding
11 the timing and other parameters of the deposition.

12 3. As part of the negotiated agreement, the Parties agreed to take the deposition of Mr.
13 Zuckerberg on Tuesday, December 17, 2024, to accommodate the schedules of Mr. Zuckerberg
14 and the Parties.

15 4. The parties’ negotiated date for the deposition of Mr. Zuckerberg will take place
16 two business days after the Court’s December 13, 2024 fact discovery deadline.

17 5. The deposition of Mr. Zuckerberg is the only deposition that the parties have
18 scheduled outside of the December 13, 2024 fact discovery deadline.

19 6. The deposition of Mr. Zuckerberg on December 17, 2024 will not impact any
20 subsequent dates in the Scheduling Order, including the deadlines for expert discovery or summary
21 judgment.

22 7. Only one extension of the fact discovery deadline has been requested and entered in
23 this case, which was the Court’s Order setting the December 13, 2024 fact discovery deadline.
24 (Doc. No. 211)

25 //

26 //

27 //

28 //

I declare under penalty of perjury that the foregoing is true and correct. Executed on this
12th day of November at Los Angeles, CA.

By: /s/ Colette Ghazarian
Colette Ghazarian

Full Counsel List

COOLEY LLP
PHILLIP MORTON (*pro hac vice*)
(pmorton@cooley.com)
COLE A. POPPELL (*pro hac vice*)
(cpoppell@cooley.com)
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
Telephone: (202) 842-7800

COOLEY LLP
MATTHEW BRIGHAM (191428)
(mbrigham@cooley.com)
JUAN PABLO GONZALEZ (334470)
(jgonzalez@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000

LEX LUMINA PLLC
MARK A. LEMLEY (155830)
(mlemley@lex-lumina.com)
745 Fifth Avenue, Suite 500
New York, NY 10151
Telephone: (646) 898-2055